

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

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SUBJECT: Air Programs Branch Review of the Revised Remedial Investigation Report for the LE Carpenter Superfund Site

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The Air Programs Branch has examined the Revised Remedial Investigation (RI) report for the LE Carpenter Superfund Site, located in Wharton New Jersey.

**Site Description:**

This site was a former iron ore mine, dating back to the mid and late 1800's. In the last half century, several wallcovering manufacturing operations existed there, and waste disposal operations of solvents and polyvinyl chloride into a surface impoundment occurred in the 1960's. These pollutants eventually reached the water table resulting in groundwater contamination. The object of this review is to identify potential air pollution impacts on the surrounding community which are directly attributable to the LE Carpenter site.

**Comments:**

The report mentions in several places that there doesn't seem to be an air quality problem caused by this site. This is based on actual atmospheric sampling, performed at several on-site locations, one sample per month, for a ten month period. A review of the data seems to corroborate this assertion for all of the pollutants except chromium. Table 29 in Volume II of the report ("Summary of Priority Pollutant Metals Testing - Air Sampling Results") lists a chromium concentration of 10.4 ug/m<sub>3</sub> for the 7/19-20/89 sample, the maximum concentration observed during the sampling period.

We analyzed the risk implications of this concentration using a PC risk screening program and, a high risk value ( $2 \times 10^{-2}$ ) for excess cancer deaths was computed. The report doesn't indicate this potential in the Risk Assessment discussion on page 81 ("Air Pathway") where it is mentioned "no airborne contaminants were detected at any location in concentrations exceeding elevated ambient levels or OSHA standards". The phrase "exceeding elevated ambient levels" is unclear, but in any event, this statement and



the one made on page 86 ("chromium was not detected in any air samples...") seems to contradict the air sampling results. The report mentions that the closest residence to the site is over a mile away, but states there are industrial plants located within a mile of the site. Workers at these plants may have been and continue to be exposed to unacceptably high concentrations of airborne chromium-containing dusts. This fact should be stated and addressed in future site documents, perhaps resulting in eventual remediation of soil not only as source control for groundwater contamination, but air contamination as well. Kindly ring me up on extension 2335 with any questions you may have regarding air impacts at the LE Carpenter site.

cc: J. Menczel, AWM-AC